

The Bulgari Trademarks

76. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 76 of the Complaint.

77. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 77 of the Complaint.

78. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 78 of the Complaint.

79. Defendants accept this designation for the purposes of the Amended Complaint.

80. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 80 of the Complaint.

81. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 81 of the Complaint.

The Bulgari Copyrighted Designs

82. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 82 of the Complaint.

83. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 83 of the Complaint.

84. Defendants accept this designation for the purposes of the Amended Complaint.

85. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 85 of the Complaint.

86. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 86 of the Complaint.

The Bulgari Design Patents

87. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 87 of the Complaint.

88. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 88 of the Complaint.

89. Defendants accept this designation for the purposes of the Amended Complaint.

90. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 90 of the Complaint.

91. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 90 of the Complaint.

Overstock's Acts of Infringement and Unfair Competition

92. Defendants deny the allegation contained in paragraph 92 of the Complaint that they are in the business of manufacturing jewelry and watch designs, but admits all other allegations contained in this paragraph.

93. Defendants admit the allegation contained in paragraph 93 of the Complaint that they are using the Cartier, Van Cleef, Gucci and Bulgari trademarks without authorization from their owners, but deny the allegations that this use is likely to cause consumer confusion as to the authenticity or approval of the products sold on Defendants' web-site.

94. Defendants deny the allegations contained in paragraph 94 of the Complaint.

95. Defendants deny the allegations contained in paragraph 95 of the Complaint.

96. Defendants deny the allegations contained in paragraph 96 of the Complaint.

97. Defendants deny the allegations contained in paragraph 97 of the Complaint.

98. Defendants deny the allegations contained in paragraph 98 of the Complaint.

99. Defendants deny the allegations contained in paragraph 99 of the Complaint.

100. Defendants deny the allegations contained in paragraph 100 of the Complaint.

101. Defendants deny the allegations contained in paragraph 101 of the Complaint.

**Cartier's First Claim for Relief
Trademark Infringement**

102. Defendants repeat and reallege each and every response contained in paragraphs 1 through 34 and 92 through 101 of this Answer as if fully set forth herein.

103. Defendants deny the allegations contained in paragraph 103 of the Complaint.

104. Defendants deny the allegations contained in paragraph 104 of the Complaint.

105. Defendants deny the allegations contained in paragraph 105 of the Complaint.

106. Defendants deny the allegations contained in paragraph 106 of the Complaint.

107. Defendants deny the allegations contained in paragraph 107 of the Complaint.

108. Defendants deny the allegations contained in paragraph 108 of the Complaint.

**Cartier's Second Claim for Relief
Trademark Infringement**

109. Defendants repeat and reallege each and every response contained in paragraphs 1 through 34 and 92 through 108 of this Answer as if fully set forth herein.

110. Defendants deny the allegations contained in paragraph 110 of the Complaint.

111. Defendants deny the allegations contained in paragraph 111 of the Complaint.

112. Defendants deny the allegations contained in paragraph 112 of the Complaint.

113. Defendants deny the allegations contained in paragraph 113 of the Complaint.

114. Defendants deny the allegations contained in paragraph 114 of the Complaint.

115. Defendants deny the allegations contained in paragraph 115 of the Complaint.

**Cartier's Third Claim for Relief
False Designation of Origin**

116. Defendants repeat and reallege each and every response contained in paragraphs 1 through 34 and 92 through 115 of this Answer as if fully set forth herein.

117. Defendants deny the allegations contained in paragraph 117 of the Complaint.

118. Defendants deny the allegations contained in paragraph 118 of the Complaint.

119. Defendants deny the allegations contained in paragraph 119 of the Complaint.

120. Defendants deny the allegations contained in paragraph 120 of the Complaint.

**Cartier's Fourth Claim for Relief
False Advertising**

121. Defendants repeat and reallege each and every response contained in paragraphs 1 through 34 and 92 through 120 of this Answer as if fully set forth herein.

122. Defendants deny the allegations contained in paragraph 122 of the Complaint.

123. Defendants deny the allegations contained in paragraph 123 of the Complaint.

124. Defendants deny the allegations contained in paragraph 124 of the Complaint.

125. Defendants deny the allegations contained in paragraph 125 of the Complaint.

**Cartier's Fifth Claim for Relief
Trademark Dilution**

126. Defendants repeat and reallege each and every response contained in paragraphs 1 through 34 and 92 through 125 of this Answer as if fully set forth herein.

127. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 127 of the Complaint.

128. Defendants deny the allegations contained in paragraph 128 of the Complaint.

129. Defendants deny the allegations contained in paragraph 129 of the Complaint.

130. Defendants deny the allegations contained in paragraph 130 of the Complaint.

131. Defendants deny the allegations contained in paragraph 131 of the Complaint.

132. Defendants deny the allegations contained in paragraph 132 of the Complaint.

133. Defendants deny the allegations contained in paragraph 133 of the Complaint.

**Cartier's Sixth Claim for Relief
Copyright Infringement**

134. Defendants repeat and reallege each and every response contained in paragraphs 1 through 34 and 92 through 133 of this Answer as if fully set forth herein.

135. Defendants deny the allegations contained in paragraph 135 of the Complaint.

136. Defendants deny the allegations contained in paragraph 136 of the Complaint.

137. Defendants deny the allegations contained in paragraph 137 of the Complaint.

138. Defendants deny the allegations contained in paragraph 138 of the Complaint.

139. Defendants deny the allegations contained in paragraph 139 of the Complaint.

140. Defendants deny the allegations contained in paragraph 140 of the Complaint.

**Cartier's Seventh Claim for Relief
Copyright Infringement**

141. Defendants repeat and reallege each and every response contained in paragraphs 1 through 34 and 92 through 140 of this Answer as if fully set forth herein.

142. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 142 of the Complaint.

143. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 142 of the Complaint that the French Copyrighted Designs were first offered for sale in France, but deny all other allegations contained in this paragraph.

144. Defendants deny the allegations contained in paragraph 144 of the Complaint.

145. Defendants deny the allegations contained in paragraph 145 of the Complaint.

146. Defendants deny the allegations contained in paragraph 146 of the Complaint.

147. Defendants deny the allegations contained in paragraph 147 of the Complaint.

148. Defendants deny the allegations contained in paragraph 148 of the Complaint.

**Cartier's Eighth Claim for Relief
Design Patent Infringement**

149. Defendants repeat and reallege each and every response contained in paragraphs 1 through 34 and 92 through 148 of this Answer as if fully set forth herein.

150. Defendants deny the allegations contained in paragraph 150 of the Complaint.

151. Defendants deny the allegations contained in paragraph 151 of the Complaint.

152. Defendants deny the allegations contained in paragraph 152 of the Complaint.

153. Defendants deny the allegations contained in paragraph 153 of the Complaint.

154. Defendants deny the allegations contained in paragraph 154 of the Complaint.

**Cartier's Ninth Claim for Relief
Common Law Trademark Infringement**

155. Defendants repeat and reallege each and every response contained in paragraphs 1 through 34 and 92 through 154 of this Answer as if fully set forth herein.

156. Defendants deny the allegations contained in paragraph 156 of the Complaint.